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*Attorneys for Plaintiff Foreo, Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

FOREO, INC.,  
Plaintiff,  
  
v.  
  
TIK TEK MARKETING S DE RL DE CV,  
Defendant.

Case No. 2:20-cv-1690-JCM-VCF

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING PLAINTIFF’S  
DEADLINE TO OPPOSE  
DEFENDANT’S MOTION TO  
DISMISS**

**(FIRST REQUEST)**

Plaintiff Foreo Inc. (“Foreo”) and Defendant Tik Tek Marketing S de RL de CV (“Tik Tek”), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. This action was filed on September 11, 2020. (*See* ECF No. 1.)
2. On April 19, 2022, Matthew C. DeFrancesco, counsel for Foreo, and Marco Molina, counsel for Tik Tek, discussed the status of this matter, including service of the summons and complaint on Tik Tek and Tik Tek’s need to retain local counsel. On May 2, 2022, counsel stipulated to waive service and extend the deadline by which Tik Tek must file a responsive pleading.
3. On May 3, this Court granted the parties’ stipulation and extended Tik Tek’s responsive pleading deadline to June 20, 2022. Subsequently, on June 17, 2022, the Court further

1 granted the parties' stipulation by which the parties agreed to an additional one-week extension  
2 for Tik Tek, due to medical issues impacting Tik Tek's counsel.

3 4. In connection with the same, the parties now further stipulate and agree that  
4 Foreo's deadline to file an opposition to Tik Tek's pending Motion to Dismiss is extended from  
5 August 3, 2022 until and through September 2, 2022. This is the first time that Foreo has  
6 requested an extension in connection with the aforesaid Motion to Dismiss, and requests the  
7 extension to, *inter alia*, translate and address foreign proceedings that are referenced in Tik Tek's  
8 Motion to Dismiss.

9 5. The parties further stipulate and agree that Tik Tek's deadline to file a reply in  
10 further support of its Motion to Dismiss shall be October 3, 2022.

11 Dated this 14th day of July 2022

Dated this 14th day of July 2022

12  
13 /s/ Rob L. Phillips  
FISHERBROYLES, LLP

/s/ Steven E. Kish III  
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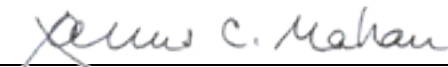
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**ORDER**

The Court has reviewed the stipulation of the parties and finds good cause exists to grant the same. Accordingly,

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that Plaintiff shall have up to and including September 2, 2022 to file its opposition to Defendant's Motion to Dismiss the Complaint, and Defendant shall have until October 3, 2022 to file a reply in connection with the same.

IT IS SO ORDERED:

  
\_\_\_\_\_  
United States District Judge

Dated: July 15, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing, **STIPULATION AND [PROPOSED] ORDER EXTENDING PLAINTIFF'S DEADLINE TO OPPOSE DEFENDANT'S MOTION TO DISMISS** in this action or proceeding electronically with the Clerk of the Court via the Court's filing system, which will cause this document to be served upon the following counsel of record:

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I certify under penalty of perjury the foregoing is true and correct, and this Certificate of Service was executed by me on July 14, 2022, at Las Vegas, Nevada.

By: /s/ Rob L. Phillips  
Rob Phillips